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Attorneys for Defendant
Republic of Liberia

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

ST. LUKE SCHOOL OF MEDICINE;
DR. JERROLL B.R. DOLPHIN and
DR. ROBERT FARMER on behalf of
himself and all others similarly
situated,

Plaintiffs,

v.

REPUBLIC OF LIBERIA; MINISTRY
OF HEALTH, a Liberian
Governmental Agency; LIBERIAN
MEDICAL BOARD, a Liberian
Governmental Agency; NATIONAL
COMMISSION ON HIGHER
EDUCATION, a Liberian
Governmental Agency; NATIONAL
TRANSITIONAL LEGISLATIVE
ASSEMBLY, a Liberian Governmental
Agency; DR. ISAAC ROLAND;
MOHAMMED SHERIFF; DR.
BENSON BARH; BR. GEORGE
GOLLIN; EDUCATION
COMMISSION FOR FOREIGN
MEDICAL GRADUATES, a
Pennsylvania Non-Profit organization;
FOUNDATION FOR
ADVANCEMENT OF
INTERNATIONAL EDUCATION
AND RESEARCH, a Pennsylvania
Non-Profit Organization;
UNIVERSITY OF ILLINOIS-
URBAN, an Illinois Institution of
Higher Learning; STATE OF
OREGON, Office of Degree
Authorization,

Defendants.

CASE NO. 10-CV-1791 RGK (SHx)

DEFENDANT REPUBLIC OF
LIBERIA'S NOTICE OF MOTION AND
MOTION TO DISMISS PLAINTIFFS'
FIRST AMENDED COMPLAINT
PURSUANT TO FEDERAL RULES OF
CIVIL PROCEDURE 8, 12(b)(1), AND
12(b)(6)

*[FILED CONCURRENTLY WITH
MEMORANDUM OF POINTS AND
AUTHORITIES; DECLARATION OF
AMANDA J. KLOPF; AND [PROPOSED]
ORDER]*

[Fed. R. Civ. P. 8, 12(b)(1), 12(b)(6)]

Date: August 16, 2010

Time: 9:00 a.m.

Judge: Hon. R. Gary Klausner

TO THE COURT, ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE THAT pursuant to Federal Rules of Civil Procedure 12(b)(1), 12(b)(6) and 8, Defendant Republic of Liberia will, and hereby does, move to dismiss the First Amended Complaint in the above-captioned action (the "Complaint"). The hearing on the Motion will be at August 16, 2010 at 9:00 a.m. or as soon thereafter as the matter may be heard before the Honorable R. Gary Klausner in Courtroom 850 of the United States District Court for the Central District of California located at the Roybal Federal Building, 255 E. Temple Street, Los Angeles, California, 90012. As set forth in greater detail in the accompanying Memorandum of Points and Authorities, this Motion seeks dismissal of the Complaint pursuant to Federal Rules of Civil Procedure 12(b)(1), 12(b)(6) and 8 for lack of subject matter jurisdiction, failure to state a claim upon which relief can be granted and failure to plead with particularity.

This Motion is based upon this Notice of Motion and Motion to Dismiss, the attached Memorandum of Points and Authorities, the Declaration of Amanda J. Klopff, the pleadings on file in this action, and such further evidence and argument as may be offered at the time of hearing of this Motion.

Dated: July 19, 2010

Respectfully submitted,

LATHAM & WATKINS LLP
Manny A. Abascal
Amy C. Quartarolo
Amanda J. Klopff

By /s/ Amanda J. Klopff
Attorneys for Defendant Republic of
Liberia